

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
3 ANDREW WONG
Assistant Federal Public Defender
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
6 (702) 388-6261/Fax
Andrew_Wong@fd.org
7
8 Attorney for Terrance Brown

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 TERRANCE BROWN,
16 Defendant.

Case No. 2:20-CR-271-RFB-VCF

**STIPULATION TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Andrew Wong, Assistant Federal Public Defender, counsel for Terrance Brown, that the Court
21 modify the conditions of pretrial release.

22 The Stipulation is entered into for the following reasons:

23 1. On January 28, 2021, this Court released Mr. Brown on conditions of pretrial
24 release. Among the conditions imposed was a requirement that Mr. Brown reside with his
25 brother Kenyoun McCoy (Condition #22); Mr. Brown would be subject to home incarceration
26

(Condition #51C); and a prohibition on association with anyone outside Mr. Brown and Mr. McCoy's immediate family.

2. Since his release, Pretrial Services Officer Jessie Moorehead reports that Mr. Brown was complied with all the conditions of his pretrial release.

3. In order to allow Mr. Brown greater opportunities to care for his family, the parties request that the Court modify the condition of pretrial release as follows: Condition #22 be changed from "brother Kenyoun McCoy's residence" to "a residence approved by Pretrial Services"; Condition #51C: home incarceration be replaced with Condition #51A: curfew; and Condition #82, the association restriction, be removed.

4. Pretrial Services does not oppose the requested modification.

This is the first stipulation to modify conditions of pretrial release filed herein.

DATED this 13th day of May, 2021.

RENE L. VALLADARES
Federal Public Defender

/s/ Andrew Wong
By _____

ANDREW WONG
Assistant Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Daniel J. Cowhig
By _____

DANIEL J. COWHIG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,
6 v.
7 TERRANCE BROWN,
8 Defendant.

Case No. 2:20-CR-271-RFB-VCF
ORDER

9 Based on the pending Stipulation of counsel, and good cause appearing,

10 IT IS THEREFORE ORDERED that the conditions of pretrial release are modified as
11 follows:
12

- 13 1. Condition #22 is changed from “brother Kenyoun McCoy’s residence” to “a
14 residence approved by Pretrial Services”
15 2. Condition #51C: home incarceration is replaced with Condition #51A: curfew
16 3. Condition #82, the association restriction, is removed.

17 DATED this 14th day of May, 2021.

18 

19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE
21
22
23
24
25
26